

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GEORGE VANGELAKOS, IAN KING,	:	
JOSEPH KORONAKIS, AND BARRY	:	Case No. 13 CV 6574
WAYNE, Individually and on Behalf of All	:	
Others Similarly Situated,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
WELLS FARGO BANK, N.A., WELLS	:	
FARGO & COMPANY, WFC HOLDINGS	:	
CORPORATION, WACHOVIA	:	
CORPORATION, AND WACHOVIA	:	
BANK, N.A.,	:	
	:	
Defendants.	:	
	:	
	:	
	X	

**DEFENDANTS' NOTICE OF INTENT TO TAKE THE  
ORAL/VIDEOTAPED DEPOSITION OF IAN KING**

TO: Plaintiff, Ian King, by and through his attorneys of record, Rhonda H. Wills, Wills Law Firm, 1776 Yorktown, Suite 600, Houston, Texas 77056 and John M. Padilla, Padilla, Rodriguez & De La Garza, L.L.P., 1776 Yorktown, Suite 110, Houston, Texas 77056.

**PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure, the undersigned will take the oral/videotaped deposition of Ian King on **Tuesday, February 4, 2014 at 9:00 a.m.** at the offices of Seyfarth Shaw LLP, 620 8th Avenue, 32nd Floor, New York, New York 10018 [Broadway Conference Room], before a certified court reporter and will be held from day to day until completed. Said deposition is to be used as evidence in the trial of this cause. All counsel of record are invited to attend and cross-examine.

Dated: Houston, Texas  
December 19, 2013

SEYFARTH SHAW LLP

By: 

Timothy M. Watson (pro hac vice)  
twatson@seyfarth.com  
Esteban Shardonofsky (pro hac vice)  
sshardonofsky@seyfarth.com  
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Houston, Texas 77002-2797  
Telephone: (713) 225-2300  
Facsimile: (713) 225-2340

Robert S. Whitman  
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620 Eighth Avenue  
New York, New York 10018  
Phone: (212) 218-5500  
Fax: (917) 344-1258

ATTORNEYS FOR DEFENDANTS

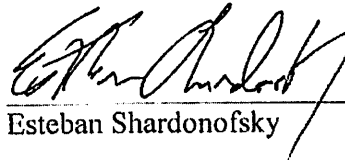
**CERTIFICATE OF SERVICE**

The undersigned attorney hereby affirms that he caused a true and correct copy of the within and foregoing Defendants' Notice of Intent to take the Oral Deposition of Ian King to be served upon the counsel of record for Plaintiff via e-mail, facsimile and certified mail return receipt requested to the addresses listed below on this 19th day of December, 2013:

Rhonda H. Wills  
Wills Law Firm  
1776 Yorktown, Suite 600  
Houston, Texas 77056

John M. Padilla  
Padilla, Rodriguez & De La Garza, L.L.P.  
1776 Yorktown, Suite 110  
Houston, Texas 77056

Michael Raymond DiChiara  
Krakower DiChiara LLC  
One Depot Square  
77 Market Street, Suite 2  
Park Ridge, NJ 07656

  
\_\_\_\_\_  
Esteban Shardonofsky

UNITED STATES DISTRICT COURT  
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FARGO & COMPANY, WFC HOLDINGS	:	
CORPORATION, WACHOVIA	:	
CORPORATION, AND WACHOVIA	:	
BANK, N.A.,	:	
	:	
Defendants.	:	
	:	
	X	

**DEFENDANTS' AMENDED NOTICE OF INTENT TO TAKE THE  
ORAL/VIDEOTAPED DEPOSITION OF IAN KING**

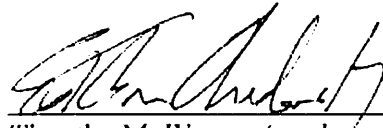
TO: Plaintiff, Ian King, by and through his attorneys of record, Rhonda H. Wills, Wills Law Firm, 1776 Yorktown, Suite 600, Houston, Texas 77056 and John M. Padilla, Padilla, Rodriguez & De La Garza, L.L.P., 1776 Yorktown, Suite 110, Houston, Texas 77056.

**PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure, the undersigned will take the oral/videotaped deposition of Ian King on **Thursday, February 13, 2014 at 9:00 a.m.** at the offices of Seyfarth Shaw LLP, 620 8th Avenue, 32nd Floor, New York, New York 10018 [Harlem Conference Room], before a certified court reporter and will be held from day to day until completed. Said deposition is to be used as evidence in the trial of this cause. All counsel of record are invited to attend and cross-examine.

Dated: Houston, Texas  
January 8, 2014

SEYFARTH SHAW LLP

By:



Timothy M. Watson (pro hac vice)  
twatson@seyfarth.com  
Esteban Shardonofsky (pro hac vice)  
sshardonofsky@seyfarth.com  
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Telephone: (713) 225-2300  
Facsimile: (713) 225-2340

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Adam J. Smiley  
asmiley@seyfarth.com  
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New York, New York 10018  
Phone: (212) 218-5500  
Fax: (917) 344-1258

ATTORNEYS FOR DEFENDANTS

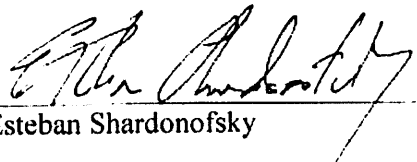
**CERTIFICATE OF SERVICE**

The undersigned attorney hereby affirms that he caused a true and correct copy of the within and foregoing Defendants' Amended Notice of Intent to take the Oral/Videotaped Deposition of Ian King to be served upon the counsel of record for Plaintiff via e-mail, facsimile and certified mail return receipt requested to the addresses listed below on this 8th day of January, 2014:

Rhonda H. Wills  
Wills Law Firm  
1776 Yorktown, Suite 600  
Houston, Texas 77056

John M. Padilla  
Padilla, Rodriguez & De La Garza, L.L.P.  
1776 Yorktown, Suite 110  
Houston, Texas 77056

Michael Raymond DiChiara  
Krakower DiChiara LLC  
One Depot Square  
77 Market Street, Suite 2  
Park Ridge, NJ 07656

  
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Esteban Shardonofsky

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Others Similarly Situated,	:	
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Plaintiffs,	:	
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FARGO & COMPANY, WFC HOLDINGS	:	
CORPORATION, WACHOVIA	:	
CORPORATION, AND WACHOVIA	:	
BANK, N.A.,	:	
	:	
Defendants.	:	
	:	
	X	

**DEFENDANTS' SECOND AMENDED NOTICE OF INTENT TO TAKE THE  
ORAL/VIDEOTAPED DEPOSITION OF IAN KING**


TO: Plaintiff, Ian King, by and through his attorneys of record, Rhonda H. Wills, Wills Law Firm, 1776 Yorktown, Suite 600, Houston, Texas 77056 and John M. Padilla, Padilla, Rodriguez & De La Garza, L.L.P., 1776 Yorktown, Suite 110, Houston, Texas 77056.

**PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure, the undersigned will take the oral/videotaped deposition of Ian King on **Friday, March 28, 2014 at 9:00 a.m.** at the offices of Seyfarth Shaw LLP, 620 8th Avenue, 33rd Floor, New York, New York 10018 [Battery Park Conference Room], before a certified court reporter and will be held from day to day until completed. Said deposition is to be used as evidence in the trial of this cause. All counsel of record are invited to attend and cross-examine.



Dated: Houston, Texas  
March 6, 2014

SEYFARTH SHAW LLP

By:   
\_\_\_\_\_  
Timothy M. Watson (pro hac vice)  
twatson@seyfarth.com  
Esteban Shardonofsky (pro hac vice)  
sshardonofsky@seyfarth.com  
700 Milam Street, Suite 1400  
Houston, Texas 77002-2797  
Telephone: (713) 225-2300  
Facsimile: (713) 225-2340

Robert S. Whitman  
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Adam J. Smiley  
asmiley@seyfarth.com  
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New York, New York 10018  
Phone: (212) 218-5500  
Fax: (917) 344-1258

ATTORNEYS FOR DEFENDANTS

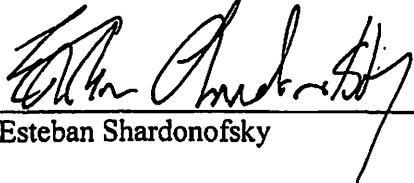
**CERTIFICATE OF SERVICE**

The undersigned attorney hereby affirms that he caused a true and correct copy of the within and foregoing Defendants' Second Amended Notice of Intent to take the Oral/Videotaped Deposition of Ian King to be served upon the counsel of record for Plaintiff via e-mail, facsimile and certified mail return receipt requested to the addresses listed below on this 8<sup>th</sup> day of March, 2014:

Rhonda H. Wills  
Wills Law Firm  
1776 Yorktown, Suite 600  
Houston, Texas 77056

John M. Padilla  
Padilla, Rodriguez & De La Garza, L.L.P.  
1776 Yorktown, Suite 110  
Houston, Texas 77056

Michael Raymond DiChiara  
Krakower DiChiara LLC  
One Depot Square  
77 Market Street, Suite 2  
Park Ridge, NJ 07656

  
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Esteban Shardonofsky

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOSEPH KORONAKIS, AND BARRY	:	Case No. 13 CV 6574
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Others Similarly Situated,	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
WELLS FARGO BANK, N.A., WELLS	:	
FARGO & COMPANY, WFC HOLDINGS	:	
CORPORATION, WACHOVIA	:	
CORPORATION, AND WACHOVIA	:	
BANK, N.A.,	:	
	:	
Defendants.	:	
	:	
	:	
	X	

**DEFENDANTS' THIRD AMENDED NOTICE OF INTENT TO TAKE THE  
ORAL/VIDEOTAPED DEPOSITION OF IAN KING**

TO: Plaintiff, Ian King, by and through his attorneys of record, Rhonda H. Wills, Wills Law Firm, 1776 Yorktown, Suite 600, Houston, Texas 77056 and John M. Padilla, Padilla, Rodriguez & De La Garza, L.L.P., 1776 Yorktown, Suite 110, Houston, Texas 77056.

**PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure, the undersigned will take the oral/videotaped deposition of Ian King on **Wednesday, April 23, 2014 at 9:00 a.m.** at the offices of Seyfarth Shaw LLP, 620 8th Avenue, 32nd Floor, New York, New York 10018 [NYC Gramercy Conference Room], before a certified court reporter and will be held from day to day until completed. Said deposition is to be used as evidence in the trial of this cause. All counsel of record are invited to attend and cross-examine.

Dated: Houston, Texas  
March 21, 2014

SEYFARTH SHAW LLP

By:

A handwritten signature in black ink, appearing to read "Timothy M. Watson", is written over a horizontal line.

Timothy M. Watson (pro hac vice)  
twatson@seyfarth.com  
Esteban Shardonofsky (pro hac vice)  
sshardonofsky@seyfarth.com  
700 Milam Street, Suite 1400  
Houston, Texas 77002-2797  
Telephone: (713) 225-2300  
Facsimile: (713) 225-2340

Robert S. Whitman  
rwhitman@seyfarth.com  
Adam J. Smiley  
asmiley@seyfarth.com  
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New York, New York 10018  
Phone: (212) 218-5500  
Fax: (917) 344-1258

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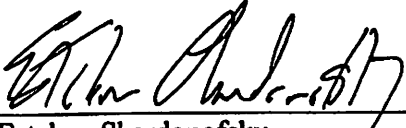
**CERTIFICATE OF SERVICE**

The undersigned attorney hereby affirms that he caused a true and correct copy of the within and foregoing Defendants' Third Amended Notice of Intent to take the Oral/Videotaped Deposition of Ian King to be served upon the counsel of record for Plaintiff via e-mail, facsimile and certified mail return receipt requested to the addresses listed below on this 21st day of March, 2014:

Rhonda H. Wills  
Wills Law Firm  
1776 Yorktown, Suite 600  
Houston, Texas 77056

John M. Padilla  
Padilla, Rodriguez & De La Garza, L.L.P.  
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Houston, Texas 77056

Michael Raymond DiChiara  
Krakower DiChiara LLC  
One Depot Square  
77 Market Street, Suite 2  
Park Ridge, NJ 07656

  
\_\_\_\_\_  
Esteban Shardonofsky